

## DATA RETENTION POLICY AND SCHEDULE

### 1. Purpose

The Football Foundation is committed to protecting the privacy and confidentiality of personal information relating to grant applications, representatives of current and former grantees, and for those who apply to work for the Football Foundation. The aim of this policy is to provide a framework for the retention and disposal of personal data in these circumstances.

### 2. About this policy

This policy is written with due regard to the principles and guidelines laid out in the General Data Protection Regulation (“the GDPR”) and any related legislation which applies in the UK, including, without limitation, any legislation derived from the Data Protection Bill 2017.

### 3. Data protection principles

Anyone processing personal data must comply with the six data protection principles set out in the GDPR. We are required to comply with these principles (summarised below), and show that we comply, in respect of any personal data that we deal with.

Personal data should be:

- (a) processed fairly, lawfully and transparently;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a way which is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary for the purpose for which it is held;
- (d) accurate and, where necessary, kept up to date;
- (e) not kept longer than necessary; and
- (f) processed in a manner that ensures appropriate security of the personal data.

### 4. Effective records management

The first data protection principle of the GDPR requires that personal data is obtained fairly and lawfully and processed for purposes that the data subject has been told about. Alongside the Privacy Statement, this policy is in place to comply with this principle. It sets out the information that we collect about you and how long it is retained for. There are however, further benefits of effective records management, which include:

- Complying with legal and regulatory requirements;
- Ensuring our information can be found and retrieved quickly and efficiently;
- Reducing risk for litigation; and
- Minimising storage requirements and reducing costs.

### 5. Data retention periods for awarded grants

Annex A outlines how long we will keep your personal data for in relation to the execution of the grant contract that is awarded by the Football Foundation or Football Stadia Improvement Fund once accepted by the grantee organisation. The grant retention periods are defined in accordance with the clawback period of the grant terms and conditions and the minimum period stated in the statute of limitations. The minimum retention period is dependent on the scheme your grant was awarded under.

## **6. Data retention periods for rejected grants**

Where grant applications are made but are rejected, in general we remove your personal information from our records 12 months after the date it was collected.

## **7. Data retention periods for job applicants**

In relation to job applications, if you are successful in your application, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment, plus 6 years following the end of your employment.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from your being notified that your application has been unsuccessful.

## **8. Your rights in relation to your data**

Under the new laws you have a number of rights relating to your personal data, however, please note that some of these rights only apply in limited circumstances. These rights and how you can exercise them are detailed in our Privacy Statement which is available from the Football Foundation (<https://www.footballfoundation.org.uk/>) or Football Stadia Improvement Fund (<https://www.fsif.co.uk/>) websites.

## **9. How to contact us**

Please let us know if you have any questions or concerns about this policy or about the way in which the Foundation uses your personal information by contacting us using the channels below. Please ask for/mark messages for the attention of the Head of Business Services.

Email: [enquiries@football.foundation.org.uk](mailto:enquiries@football.foundation.org.uk)

Telephone: 0345 345 4555

Post: Football Foundation, Whittington House, 19-30 Alfred Place, London, WC1E 7EA.

## **10. Policy review**

The Foundation is committed to keeping this policy current and relevant. It will be monitored and reviewed annually, or as required, and may be amended from time to time to reflect any changes in legislation, regulatory guidance or internal policy decisions.

**Football Foundation**  
**May 2018**

## Annex A

The below table groups the personal data retention periods held against each grant by scheme type.

Scheme groups	Personal data retention periods
Community	Last payment date + 6 years
Facilities	27 years from offer
FSIF	27 years from offer
Funded Programme	Last payment date + 6 years
Goalpost Safety Scheme	7 years from offer
Grow the Game	11 years from offer
Junior Kit Scheme	Last payment date + 6 years
Other	Last payment date + 6 years
Parklife	27 years from offer
Premier League Kit Scheme	7 years from offer
Small Grants Scheme	Last payment date + 6 years